WEEKLY STATUS REPORT 8
Parcel E Standard Data Gaps Investigation
Hunters Point Shipyard, San Francisco, California
Week Ending: September 21, 2002

1. WORK ACCOMPLISHED THIS WEEK

PLANS

The Navy prepared responses to EPA's additional comments on the draft DQOs. The responses are included as Attachment A.

FIELD WORK

Phase I – Equipment and materials used to perform the Phase I sampling were demobilized.

Phase II

- Provided sample coordinates for all Phase II sample locations
- Prepared data-entry procedure for ITSI, the Phase II contractor, to electronically enter sample location, and chain-of-custody information into the Hunters Point database.

LABORATORY ANALYSIS

One double-blind performance evaluation sample was submitted to Laucks Laboratories this week. The sample was analyzed for semi-volatiles, pesticides, PCBs, and metals.

DATA MANAGEMENT

- Continued coordination with the laboratories for analyses of samples collected between 08/26/02 and 09/20/02.

- Continued entering chains of custodies into the sample tracking system. Laboratory data and EDDs were received and reviewed for completeness.

- Boring logs were entered into the boring log database.

- Entered tracking drilling progress in the field for Phase I into the drilling production database, and the sample locations for the Phase II sampling effort .

2. TECHNICAL ISSUES/ACTIONS TAKEN

Answers to questions raised by EPA on prior weekly reports are included as Attachment B.

3. PROJECTED WORK NEXT WEEK

PLANS

Navy comments on response to EPA's additional comments on the draft DQOs will be incorporated. The Navy will finalize the comment response and distribute to the BCT. Comments on the SAP from the regulatory agencies are due on September 19, 2002; DTSC has asked for a two-week extension, (October 3, 2002.)

FIELD WORK

The Navy is reviewing ITSI's technical approach to identify coordination issues to be resolved during the kickoff meetings.

Attachment A

RESPONSES TO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE NAVY'S RESPONSES TO EPA COMMENTS ON THE DATA QUALITY OBJECTIVES TABLES IN THE REVISED DRAFT FINAL PARCEL STANDARD DATA GAPS INVESTIGATION SAMPLING AND ANALYSIS PLAN HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

This document presents the U.S. Department of the Navy's (Navy) responses to comments from the U.S. Environmental Protection Agency (EPA) on the Navy's responses to previous EPA comments on the data quality objectives (DQO) tables (Tables 3 and 4) in the "Revised Draft Final Parcel E Standard Data Gaps Investigation Sampling and Analysis Plan, Hunters Point Shipyard, San Francisco, California," dated August 8, 2002. The Navy received the comments addressed below from EPA on August 26, 2002.

Responses to EPA Comments

1. Comment: **Specific comment 4 was not fully understood. The first part of the comment, which dealt with erosion, was understood and the response addresses most of the USEPA's concerns. The remaining question is whether it is important to understand where former source areas were if erosion has removed the entire source area. This might be important for assessing the source of contamination observed in Parcel F.**

Response: If the source area has eroded, then it is no longer considered an existing source. However, the Navy conducted a comprehensive review of historical records and aerial photographs in an attempt to identify all potential source areas in Parcel E. The results of this evaluation were considered when determining locations for both onshore and shoreline sampling locations. Additionally, the shoreline sampling locations were placed adjacent to areas of offshore contamination to evaluate potential onshore source areas.

2. Comment: **The remainder of this same comment, regarding areas that were subsequently buried, was not addressed. The concern is that an area that was formerly a source of contamination to the offshore sediments in Parcel F was subsequently buried, and that the original source area may be at a depth greater than the 2.5 foot depth proposed for sampling. It is possible that fill**

materials depressed the soft bay sediments, and the original source area is now buried at a greater depth than 2.5 feet. The decision rule, as stated in the response, does not address this potential. Please discuss the potential that a former source area may be buried at a depth greater than 2.5 feet in the decision rules.

Response: Other than the landfill, there is no indication of a subsurface source of contamination along the shoreline that has sunk below 2.5 feet. Based on the field work to date, there has been no major refusal of the coring device and there is no sign of large subsurface sources of contamination. Further, most of the contamination detected in Parcel F can be attributed to areas along the Parcel E shoreline such as the landfill, the kiln brick area, the black sand area, and the metallic debris reef, all of which are being sampled under the shoreline investigation. The purpose of the shoreline investigation is to identify current sources, as described in the data quality objectives.

RESPONSES TO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE WEEKLY STATUS REPORTS FOR THE PARCEL E STANDARD DATA GAPS INVESTIGATION FIELD EFFORT AT HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

This document presents the U.S. Department of the Navy's (Navy) responses to comments from the U.S. Environmental Protection Agency (EPA) on the weekly status reports for the Parcel E standard data gaps investigation field effort conducted at Hunters Point Shipyard, San Francisco, California. The Navy received the comments addressed below from EPA on September 9, 2002.

Responses to EPA Comments

1. Comment: For weekly report #3 dated 8/18/02: The report indicates that there were "three locations where access for subsurface soil sampling is impeded by surface soil pile ", but does not indicate what will be done about these three locations. Will they be moved, or will the soil pile be moved?

Response: The three locations were IR36B150, IR36B151 and PA36B009. The soil pile in question was south of Building 405, potentially impacting drilling at locations IR36B150 and IR36B151. After gaining access to the area, which was initially behind a locked gate, it was determined in the field that a piece of equipment was parked on top of one of the boring locations. Once the equipment was moved, both locations (RI36B150 and IR36B151) were sampled as originally designated. The third location in question, the original boring PA36B009, did not need to be resampled.

2. Comment: For weekly report #6 dated 9/7/02: (a) The report indicates that there were three locations, IR02SH006, IR05B095, and IR05B098 where petroleum hydrocarbon odors were noted at depth. Additional samples for purgeable and extractable total petroleum hydrocarbons were collected, but samples for benzene, toluene, ethylbenzene, and xylenes (BTEX) analysis were not collected. Odors imply some volatility, so it is unclear why samples for BTEX analysis were not also collected. For cases like this, it would be helpful if the reports included some indication of whether photoionization detector (PID) or flame ionization detector (FID) measurements were made and if elevated levels were detected with the PID or FID. If PID or FID measurements were not taken, the reason why BTEX samples were not analyzed should be explained.

(b) Also, the report indicates "a previously unidentified area of kiln brick and incinerator slag was observed between sampling locations IR01SH025 and IR01SH024. An extra discretionary sample for dioxin and furan analysis was collected from the kiln brick." In section 2, the additional information that "partially incinerated electrical equipment and large amounts of electrical conduit and wiring" were observed. The text does not indicate that a soil or sediment sample was collected, and it is unclear why this was not done, since the response to comments indicates that in the main kiln brick area soil or sediment samples would be collected and archived for analysis if the brick samples showed evidence of dioxins and furans. In this case, the presence of "partially incinerated electrical equipment," which could potentially have contained PCBs, should have triggered collection and analysis of a soil sample.

Response: (a) At locations IR02SH006, IR05B095, and IR05B098 where olfactory odors were detected, field instruments were used to detect VOCs. At IR02SH0006, a gas monitor for hydrocarbons (GasTech Model 201) did not detect any VOCs. Similarly, at IR05B095, and IR05B098 , a PID was used, and VOCs were not detected.

TPH extractable and purgables analysis was collected because oily sediment and a hydrocarbon odor were observed in the sample. BTEX was not analyzed because VOC's are not of ecological concern in the 0 to 2 foot range along the shoreline at these sample locations.

(b) The new kiln brick area is located between shallow landfill samples IR01SH025 and 026 and encompasses IR01SH025. If dioxins are detected in the brick sample from IR01SH025A, sediment from archived sample IR01SH025 will be analyzed for dioxin and furans. If dioxin/furans are not detected in the brick sample from IR01SH025A, sediment from IR01SH025 will not be analyzed for dioxin/furans.